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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

DEC 2 1994

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM (CONFIDENTIAL)

Subject:

Chlorothalonil (Chemical 081901, List A, Case 0097).

Determination of Polychlorinated Dioxins and

Dibezofurans. DP Barcode D207699, CBRS No. 14466,

MRID 43363301.

From:

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Special Review Section I

Chemistry Branch II - Reregistration Support

Health Effects Division (7509C)

Through:

Andrew Rathman, Section Head

Special Review Section I

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Reregistration Section 2

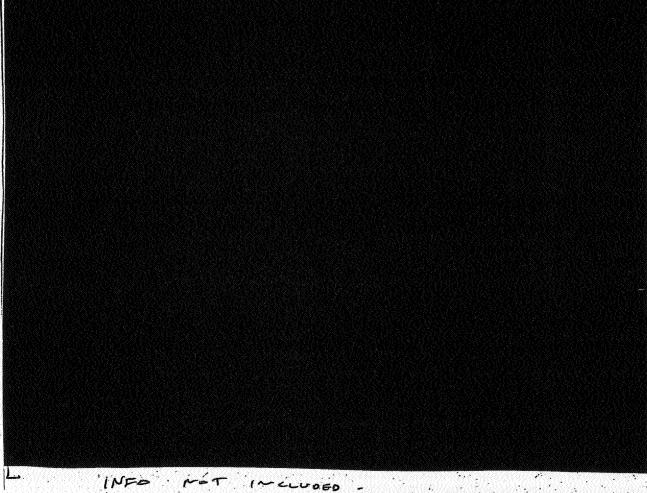
Accelerated Reregistration Branch

Special Review and Reregistration Division (7508W)

In response to a 6/87 DCI for product chemistry data on polyhalogenated dibenzo-p-dioxins/dibenzofurans in chlorothalonil, ISK Biotech Corporation previously submitted a report (W. Smith, CBRS No. 13029, DP Barcode D197984, MRID 43052701, 08/15/94) entitled "Batch Assays of Technical Chlorothalonil (EPA Reg. No. 50534-7) for Polyhalogenated Dibenzo-p-Dioxins/Dibenzofurans; Chlorothalonil Unit I Samples." It was concluded that no 2,3,7,8-substituted tetra- through heptachlorinated dibenzo-p-dioxins or dibenzofurans are present in technical chlorothalonil produced at Unit I at levels equal to or greater than the EPA-required Limits of Quantitation (LOQs), as defined in the 6/87 DCI. It was noted that a matrix spike was not included as part of the method validation as required by the Guidelines for the Determination of Halogenated Dibenzo-p-Dioxins and Dibenzofurans in Commercial Products (EPA-560/5-87/007) and by the 06/87 DCI. Because all other supporting validation data

were found to be adequate, it was concluded that the absence of the matrix spike did not compromise the study. The registrant was encouraged to include a matrix spike as part of the supporting validation data for chlorothalonil produced at the Unit II facility.

The Agency required (CBRS No. 9853, D177726, 6/3/92, S. Funk) that chlorothalonil technical samples manufactured at both of ISK Biotech Corporations's manufacturing facilities (Chlorothalonil Unit I and Chlorothalonil Unit II, formerly Daconil I and Daconil II) be analyzed for polychlorinated dibenzo-p-dioxins and dibenzofurans (PCDDs and PCDFs). The registrant now reports upon the analysis of technical chlorothalonil at Unit II in a document (CBRS No. 14466, DP Barcode D207699, MRID 43363301) entitled "Batch Assays of Technical Chlorothalonil (EPA Reg. No. 50534-7) for Polyhalogenated Dibenzo-p-Dioxins/Dibenzofurans; Final Report - Chlorothalonil Unit II Samples." The registrant claims data confidentiality for the current submission.



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